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District Of Montana
Billings Division

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Electric Cooperative Association*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

NORTHERN PLAINS RESOURCE
COUNCIL, et al.,

Plaintiffs,

v.

U.S. ARMY CORPS OF
ENGINEERS, et al.,

Defendants,

Case No. 4:19-cv-00044-GF-BMM

**MOTION BY AMERICAN GAS
ASSOCIATION, AMERICAN
PETROLEUM INSTITUTE,
ASSOCIATION OF OIL PIPE LINES,
INTERSTATE NATURAL GAS
ASSOCIATION OF AMERICA, AND
NATIONAL RURAL ELECTRIC
COOPERATIVE ASSOCIATION TO
INTERVENE AS DEFENDANTS**

TRANSCANADA KEYSTONE
PIPELINE, LP, et al.,

Defendant-Intervenors.

The American Gas Association, American Petroleum Institute, Association of Oil Pipe Lines, Interstate Natural Gas Association of America, and National Rural Electric Cooperative Association (collectively, the “NWP 12 Coalition”) respectfully move for leave to intervene as of right under Rule 24(a)(2) of the Federal Rules of Civil Procedure. Alternatively, the NWP 12 Coalition moves to intervene permissively under Rule 24(b)(1)(B) of the Federal Rules of Civil Procedure.

Attached as Exhibit 1 is NWP 12 Coalition’s Answer, which is required as part of this motion by Local Rule 24.1(b)(1)(C).

Consistent with Local Rule 7.1(c)(1), counsel has contacted the other parties. Plaintiffs stated that they oppose the motion. Federal Defendants do not oppose the motion for permissive intervention. Defendant-Intervenors TC Energy and State of Montana consent to the motion.

Date: October 15, 2019.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing to be mailed, first class postage paid, on this 15th day of October, 2019, to the following:

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